



COWAN,
DEBAETS,
ABRAHAMS &
SHEPPARD LLP

41 MADISON AVENUE
NEW YORK, NY 10010
T: 212 974 7474
F: 212 974 8474
www cdas com

NANCY E. WOLFF
212 974 7474
NWOLFF@CDAS.COM

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VIA ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deeks-Elkenaney et. al.*, 1:22 Civ 02435 (AT)(SN)

Dear Judge Netburn:

Plaintiff Lynne Freeman and Defendants Tracy Deeks-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, Universal City Studios LLC, Prospect Agency, LLC, and Emily Kim Sylvan jointly write to update the Court on the status of discovery and propose a schedule for the next phases of the litigation, pursuant to Your Honor's 2023 Orders dated January 30 (ECF No. 116); January 31 (ECF No. 118); February 14 (ECF No. 126); and March 15 (ECF No. 178).

First, the parties are on schedule to complete fact discovery including all fact depositions by March 31, 2023 as required by the above Orders. Additionally, the parties have agreed on the following proposed schedule for expert discovery and summary judgment, which we respectfully ask the Court to approve:

Event	Due Date
Expert disclosures and opening reports	4/28/23
Expert rebuttal reports and disclosure of any rebuttal experts	5/19/23
Expert depositions to be completed by	6/16/23
Pre-motion conference letters for summary judgment and/or <i>Daubert</i> motions (pursuant to Judge Stanton's Individual Rule 2.A)	6/30/23
Plaintiff's opening set of proposed findings of ultimate fact (pursuant to Judge Stanton's Individual Rule 4.A)	6/30/23
Opening summary judgment and <i>Daubert</i> motions	7/26/23
Summary judgment and <i>Daubert</i> oppositions	8/23/23
Summary judgment and <i>Daubert</i> replies	9/13/23

Second, pursuant to the Court's March 15 Order, the parties have agreed that Defendants shall produce one final update of damages discovery either 45 days from any Court decision denying in whole or in part Defendants' motion for summary judgment or 30 days before trial, whichever is earlier.



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The parties will further update the Court if any issues requiring the Court's involvement arise. Thank you for your time and attention to these issues.

Respectfully submitted,

By: /s/ Stephen M. Doniger
 Stephen M. Doniger, Esq.
DONIGER / BURROUGHS
 603 Rose Avenue
 Venice, California 90022
 (310) 590-1820
stephen@donigerlawfirm.com

CSReeder, PC
 Mark D. Passin
 11766 Wilshire Boulevard, Suite 1470
 Los Angeles, CA 90025
 310-861-2475
mark@csrlawyers.com

REITLER KAILAS & ROSENBLATT LLP
 Paul V. LiCalsi
 885 Third Avenue, Ste 20th Floor
 New York, NY 10022
 212-209-3090
plicalsi@reitlerlaw.com
Attorneys for Plaintiff Lynne Freeman

**COWAN, DEBAETS, ABRAHAMS,
& SHEPPARD LLP**

By: Nancy E. Wolff
 Nancy E. Wolff
 41 Madison Avenue, 38th Floor
 New York, New York 10010
 212-974-7474
nwolff@cdas.com

Attorneys for Defendants Tracy Deeks-Elkenaney p/k/a Tracy Wolff, Universal City Studios, LLC, Entangled Publishing, LLC and Holtzsbrinck Publishers, LLC, d/b/a Macmillan sued erroneously as Macmillan Publishers, LLC

KLARIS LAW PLLC

By: /s/Lacy H. Koonce, III
 Lacy H. ("Lance") Koonce, III
 29 Little West 12th Street
 New York, New York 10014
 917-612-5861
lancekoonce@gmail.com

Attorneys for Defendants Emily Sylvan Kim and Prospect Agency, LLC

SO ORDERED.

Dated: April 4, 2023
 New York, New York

SARAH NETBURN
 United States Magistrate Judge